**COMP**

ALISON M. BRASIER, ESQ.

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E-Mail: abrasier@lvattorneys.com*Attorney for Plaintiff*CASE NO: A-20-823130-C
Department 3**DISTRICT COURT****CLARK COUNTY, NEVADA**

MERCEDES SANCHEZ,

Plaintiff,

vs.

R.W. SELBY & COMPANY, INC. d/b/a

RANCHO SERENE APARTMENTS;

RANCHO SERENE, LLC; DOE

PROPERTY MANAGER I; DOE

MAINTENANCE COMPANY I; DOES 1-

20 and ROE BUSINESS ENTITIES 1-20,

inclusive,

Defendants.

) CASE NO.:

) DEPT. NO.:

COMPLAINT

MERCEDES SANCHEZ (hereinafter "Plaintiff"), by and through her attorney of record, ALISON M. BRASIER, ESQ., of HICKS & BRASIER, PLLC, complains and alleges against Defendants as follows:

GENERAL ALLEGATIONS

1. That Plaintiff MERCEDES SANCHEZ (hereinafter "Plaintiff") is, and at all times mentioned herein was, a resident of the County of Clark, State of Nevada.

2. That Defendant R.W. SELBY & COMPANY, INC. d/b/a RANCHO SERENE APARTMENTS (hereinafter referred to as "RANCHO SERENE"), was and is a foreign

1 corporation operating in the County of Clark, State of Nevada.

2 3. At all times mentioned Defendant RANCHO SERENE owned and/or operated the
3 Lakeview Apartments, including common areas, located at 9405 S. Eastern Avenue, Las Vegas,
4 Nevada 89123 (hereinafter referred to as “the Property”).

5 4. That Defendant RANCHO SERENE, LLC. (hereinafter referred to as
6 “RANCHO”), was and is a foreign corporation operating in the County of Clark, State of Nevada.

7 5. At all times mentioned Defendant RANCHO was the owner of the Property.

8 6. DOE PROPERTY MANAGER 1 is an individual or business responsible for
9 property management at the Property, whose identity is currently unknown to Plaintiff.

10 7. DOE MAINTENANCE COMPANY 1 is a business responsible for maintenance
11 of common areas on the Property, whose identity is currently unknown to Plaintiff

12 8. That the true names and capacities of the Defendants designated herein as DOE or
13 ROE Companies are presently unknown to Plaintiff at this time, who therefore sues said
14 Defendants by such fictitious names. When the true names and capacities of these defendants are
15 ascertained, Plaintiff will amend this Complaint accordingly.

16 9. That, at all times pertinent, Defendants were agents, servants, employees, or joint
17 venturers of every other Defendant herein, and at all times mentioned herein were acting within
18 the scope and course of said agency, employment, or joint venture, with knowledge and
19 permission and consent of all other named Defendants.

20 10. That on, or about, January 1, 2019, Plaintiff was visiting her daughter at her
21 apartment on the Property.

22 11. On, or about, said date, Plaintiff slipped on ice on the sidewalk on the Property
23 (hereinafter referred to as the “Dangerous Condition”), causing injury to Plaintiff.

24 12. Upon information and belief, the Dangerous Condition was caused as a direct
25 result of the Defendants’ failure to maintain the Property in a reasonable and safe manner.

26 13. At all times relevant, Defendants maintained and were in control of the Property,
27 and the subject Dangerous Condition, which was on the Property, where Plaintiff was injured.
28

1 obvious and dangerous condition.

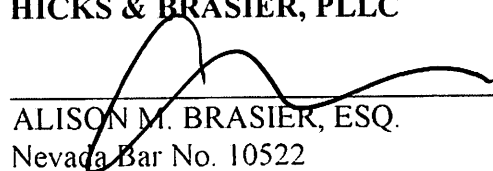
2 24. As a direct and proximate result of the negligence of Defendants, Plaintiff has been
3 damaged in an amount in excess of Fifteen Thousand Dollars (\$15,000.00).

4 WHEREFORE, Plaintiff, expressly reserving the right to amend this complaint prior to or
5 at the time of trial of this action to insert those items of damage not yet fully ascertainable, prays
6 judgment against all Defendants, and each of them, as follows:

- 7 1. For general and special damages sustained by Plaintiff in an amount in excess of
8 \$15,000.00;
9 2. For reasonable attorney's fees and costs;
10 3. For interest at the statutory rate; and
11 4. For such other relief as the Court deems just and proper.

12 DATED THIS 15 day of October 2020.

13 **HICKS & BRASIER, PLLC**

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19 Attorney for Plaintiff
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